

EXHIBIT K

AFFIDAVIT OF HOLLYE L. FARMER

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

| | | |
|-----------------------------------|---|---|
| TRACI L. JONES, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | CIVIL ACTION NO. : CV-08-BE-1599-S |
| |) | |
| FREEDOM RAIN, TLC |) | |
| d/b/a THE LOVELADY CENTER, |) | |
| |) | |
| and BRENDA SPAHN, |) | |
| |) | |
| Defendants. |) | |

AFFIDAVIT OF HOLLYE LYNN FARMER

STATE OF ALABAMA)

JEFFERSON COUNTY)

BEFORE ME, THE UNDERSIGNED Notary Public, in and for said State and in said County, personally appeared Hollye Lynn Farmer, who being known to me, upon oath duly administered deposed and said as follows:

1. My name is Hollye Lynn Farmer. I am over nineteen years of age and I have personal knowledge of the facts set forth herein.

2. I went to The Lovelady Center “TLC” on two separate occasions and copied documents produced by TLC for discovery in the Jones v. Freedom Rain case.

3. Among the documents I copied was a document called The Lovelady Center Profit & Loss January through December 2007, which was later bates stamped number of 0205 through 0207 and which is contained in Exhibit B to Plaintiff Jones’ Brief in opposition to summary judgment.

4. I asked Melinda McGahee, who was introduced to me as the Assistant Executive Director and who was present while I made copies, what some of the categories and initials on the 2007 TLC P&L stood for, or included, so I would understand what I was copying. For example, I asked her what “PDL” stood for, and she told me it was the work release program at the time, and now is called “SRP”, which stands for Supervisory Re-entry Program.

5. I also asked Mrs. McGahee if the numbers on the 2007 TLC P&L were accurate, and what might account for any inaccuracies if any? She indicated that it should be correct, but if there were any questions that I had copied all the bank statements and I should just look through them for the answer to any discrepancies in the 2007 TLC P&L.

6. One of the documents produced by Defendant Freedom Rain was a list of employers that Mrs. McGahee told me represented all the businesses they had

obtained employment for their clients from, from 2007 to present. This list was later bates stamp numbered 1271 and 1272.

7. I went through all of TLC's Renasant Bank statements for 2007, which I received from TLC and which are bates stamped pp. 0311-0711 and which are contained in Exhibits AA through LL to Plaintiff Jones' Brief in opposition to summary judgment, and I added up all the deposits made each month during that year, and they totaled two million seven hundred and seven thousand two hundred and fifty three dollars and fourteen cents (\$2,707,253.14). I also looked at TLC's P&L statement for 2007, which I received from TLC and which is bates stamped pp. 0205-0207 and which is contained in Exhibit B to Plaintiff Jones' Brief in opposition to summary judgment, and it only listed a total of one million nine hundred and twenty three thousand seven hundred and thirteen dollars and seven cents (\$1,923,713.07) for TLC's income for 2007.


Hollye Lynn Farmer

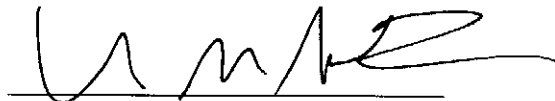
STATE OF ALABAMA)

JEFFERSON COUNTY)

Personally appeared before me, the undersigned, a Notary Public in and for said County and State, Hollye Lynn Farmer, who is known to me and who, being by me first duly sworn, deposes and says that she has read the foregoing, that the

statements contained therein are true and correct, and that she executes said foregoing voluntarily and of her own free will.

Witness my hand this 28th day of August, 2009.



Notary Public
My commission expires: 5/22/2011